

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

EUGENE SCALIA,)	
Secretary of Labor,)	
United States Department of Labor,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:17-cv-01187
)	
ZANDER GROUP HOLDINGS, INC.;)	
JEFFREY J. ZANDER, an individual;)	Judge Campbell
STEPHEN M. THOMPSON, an individual; and)	Magistrate Judge Brown
ZANDER GROUP HOLDINGS, INC.)	
EMPLOYEE STOCK OWNERSHIP PLAN,)	
)	
Defendants.)	

NOTICE OF COMPROMISE AND REQUEST TO STAY TRIAL DEADLINES

Plaintiff Eugene Scalia, Secretary of the United States Department of Labor, and Defendants Stephen M. Thompson, Jeffrey J. Zander, and Zander Group Holdings, Inc. (collectively, the “Parties”) hereby provide notice to the Court that they have reached an agreement in principle to settle, resolve, and fully compromise all of the claims and defenses asserted in this case. The Parties are in the process of drafting and finalizing the documents necessary to effectuate the settlement agreement, and they anticipate filing a proposed consent order and judgment within the next 60 days.

Trial in this case is scheduled to begin on February 4, 2020. Additionally, pursuant to the Court’s May 13, 2019 Order (Dkt. No. 89), the following pretrial deadlines are currently scheduled:

- January 13, 2020: Deadline to exchange trial exhibits, exchange deposition

designations, file motions in limine, and file motions objecting to expert testimony;

- January 20, 2020: Deadline to file trial exhibit lists, witness lists, stipulations, the joint proposed pretrial order, and responses to any motions in limine and motions objecting to expert testimony;
- January 27, 2020: Pretrial conference.

The Parties respectfully request a stay of the trial date and all pretrial deadlines in order to avoid incurring the significant time and expense of preparing for trial, and to avoid creating unnecessary work for the Court, while they are finalizing the settlement documents.

Dated: January 10, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2020, a true and correct copy of the foregoing NOTICE OF COMPROMISE AND REQUEST TO STAY TRIAL DEADLINES was served via the Court's electronic case filing system upon the following:

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